



**Barton Springs
Edwards Aquifer**
CONSERVATION DISTRICT

sent via email

August 5, 2019

Ms. Bridget C. Bohac
Office of the Chief Clerk (MC 105)
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Subject: Comments on Application No. WQ0015594001 (Sawyer-Cleveland Wastewater Treatment Plant)

Dear Ms. Bohac:

The Barton Springs/Edwards Aquifer Conservation District (District) offers these initial comments on the above-referenced permit application. This applicant requests approval for a discharge up to 92,000 gallons per day at a 10mg/L 5-day Biochemical Oxygen Demand, 15 mg/L total suspended solids, 2mg/L ammonia nitrogen, and 6mg/L dissolved oxygen into the Long Branch Tributary in the Barton Creek Watershed.

This volume and these treatment standards are unacceptable because of the potential impact on downstream water quality in the contributing and recharge zones of the Barton Springs segment of the Edwards Aquifer. With that stated, the District acknowledges and recognizes the analysis completed by the City of Austin¹ using the WASP model on this proposed volume and treatment standards. Their analysis concluded that during low flow conditions, Barton Creek periphytic chlorophyll *a* concentrations would degrade from oligotrophic to mesotrophic levels for a distance up to 15.6 miles downstream of the confluence of Barton Creek and the Long Branch Tributary, degrading the quality of water recharging the Edwards Aquifer.

The District is a Groundwater Conservation District (GCD) and has the powers, duties, authority and responsibilities provided by Chapter 36 of the Texas Water Code and by the District's enabling legislation, Chapter 8802 of the Texas Special District Local Law. The District has the authority under state law over issues relating to the potential impact of the proposed discharge on the Trinity and Edwards Aquifer within the District. As it concerns this permit application, the District is an affected party and as such requests notice of subsequent correspondence, proceedings, draft permits, or contested case hearing on this permit application.

¹ Richter, A. 2018. "Analysis of a Proposed Wastewater Treatment Plant District to the Long Branch Tributary of Barton Creek". City of Austin Watershed Protection Department, DR-18-08

Should you have any questions regarding our comments, please contact me by phone at 512-282-8441 or by email at areinmund@bseacd.org.

Respectfully,

A handwritten signature in blue ink that reads "Alicia Reinmund-Martinez". The signature is fluid and cursive, with a large initial "A" and a long, sweeping underline.

Alicia Reinmund-Martinez
General Manager

cc:
Ms. Lili Murphy
Water Quality Division
Texas Commission on Environmental Quality

Mr. Chris Herrington
Watershed Protection Department
City of Austin